

94607, and have been duly admitted to practice law in the States of Pennsylvania, Kentucky, and California, the United States Supreme Court, the U.S. District Court for the Eastern and Western Districts of Kentucky, and the U.S. Court of Appeals for the Third, Sixth, Eighth, and Ninth Circuits. I have an application pending for admission as *pro hac vice* counsel for Claimant Trevor Barkley (“Claimant”).

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. I submit this Declaration in support of Claimant’s opposition to the Motion of Debtor LTL Management LLC (“Debtor”) for Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction. [Adv. Dkt. 2.]

4. I am the partner in charge of all aspects of Claimant’s case. I am also the lead trial lawyer in his case. As a result, I have personal knowledge of the case’s procedural posture and management.

5. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint for Personal Injuries in *Barkley v. Johnson & Johnson*, Case No. RG20066950 (“Barkley”), filed on July 6, 2020, in the Superior Court of California, County of Alameda (“State Court”).

6. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant excerpts from the transcript of Susan Barkley’s deposition testimony, taken on October 26, 2020.

7. Attached hereto as **Exhibit 3** is a true and correct copy of the First Amended Complaint for Personal Injuries (Survivorship) and Wrongful Death in *Barkley*, filed on May 20, 2021.

8. Attached hereto as **Exhibit 4** is a true and correct copy of the Trial Setting Order, Declaration filed on October 7, 2022.

9. Attached hereto as **Exhibit 5** is a true and correct copy of the Report of Dr. Ronald Dodson in *Barkley*, dated March 5, 2021.

10. Attached hereto as **Exhibit 6** is a true and correct copy of the Declaration of William Longo filed in *LTL I*, Docket No. 2348-11, and Exhibit D thereto, Docket No. 2348-12.

11. Attached hereto as **Exhibit 7** is a true and correct copy of the relevant excerpts from the Reporter's Transcript of Trial Proceedings in *Prudencio v. Johnson & Johnson*, Case No. RG20061303, Alameda County, California, Superior Court ("Prudencio"), taken on July 1, 2021.

12. Attached hereto as **Exhibit 8** is a true and correct copy of McCarthy, *Adding TEM to the Global Talc Specification*.

13. Attached hereto as **Exhibit 9** is a true and correct copy of "New Reagent Systems – Plant Trial at Windsor Minerals," dated May 14, 1974.

14. Attached hereto as **Exhibit 10** is a true and correct copy of Blount, A., *Amphibole Content of Cosmetic and Pharmaceutical Talcs*, 94 Environ. Health Perspectives 225 (1991).

15. Attached hereto as **Exhibit 11** is a true and correct copy of "Cyprus Ore Reserve Evaluation Preliminary Summary,"

16. Attached hereto as **Exhibit 12** is a true and correct copy of an Interoffice Correspondence from Munro to others re: "Cyprus Ore Reserves – Arsenic & Tremolite," dated March 25, 1992.

17. Attached hereto as **Exhibit 13** is a true and correct copy of Blount's letter to Hatcher, dated April 23, 1998.

18. Attached hereto as **Exhibit 14** is a true and correct copy of Exhibit 5 to Dr. Alice Blount's deposition transcript.

19. Attached hereto as **Exhibit 15** is a true and correct copy of Pier's letter to Crouse re: "Analysis of Fibrous Material from Argonaut Waste Rock," dated May 23, 2002.

20. Attached hereto as **Exhibit 16** is a true and correct copy of a fax from Monseau to Mann re: "Asbestos," dated February 24, 2004.

21. Attached hereto as **Exhibit 17** is a true and correct copy of AMA Analytica Services' Report, dated October 3, 2019.

22. Attached hereto as **Exhibit 18** is a true and correct copy of Telofski, A *Backgrounder on Talc and Talc Based Powders*.

23. Attached hereto as **Exhibit 19** is a true and correct copy of the Reporter's Transcript of Trial Proceedings in *Prudencio*, taken on July 8, 2021.

24. Claimant's case was awaiting a trial date and would have obtained one against J&J but for Debtor's filing of its first Chapter 11 petition in *In re LTL Management LLC*, Case No. 21-30589 ("LTL I"). As a result, Claimant's cannot prosecute his viable claims against J&J and Debtor.

25. Now, despite the dismissal of *LTL I*, Claimant cannot continue the prosecution of his case against J&J and Debtor because of the Third Amended Ex Parte Temporary Restraining Order.

26. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration on April 17, 2023, in New York, New York.

By: /s/ Joseph D. Satterley
JOSEPH D. SATTERLEY